Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION

MATT JENKINS, Plaintiff, v. M.R.S. ASSOCIATES, INC., MRS BPO, LLC, Defendants.	)	Civil Action File No. 5:10-cv-121

DEFENDANT M.R.S. ASSOCIATES, INC.'S RESPONSES TO PLAINTIFF'S FIRST REQUEST FOR ADMISSIONS, FIRST SET OF INTERROGATORIES, AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

NOW COMES Defendant M.R.S. Associates, Inc. in the above-captioned action and hereby responds to Plaintiff Matt Jenkins's First Request for Admissions, First Set of Interrogatories, and First Request for Production of Documents.

PRELIMINARY STATEMENT

(A) The following responses are based upon information presently available to Defendant that it believes to be correct. Said responses are made without prejudice to Defendant's right to utilize subsequently discovered facts.

(B) No incidental or implied admission of fact by Defendant is made by the responses below. The only admissions are expressed admissions. The fact that Defendant has answered any request, any interrogatory, or produced any document herein may not properly be taken as an admission that it accepts or admits the existence of any fact set forth or assumed by such request, or that such response constitutes admissible evidence. The fact that Defendant has answered part of all of any interrogatory is not intended to and shall not be construed to be a waiver by

Defendant of all or any part of any objection by Defendant to the admissibility of evidence at trial or the relevance of the response.

(C) The responses to the interrogatories may be supplemented by Defendant's further investigation and acquisition of information which it does not either possess or recall at this time. However, any such further supplementation shall be made only in accordance with the Federal Rules of Civil Procedure.

(D) Defendant shows that, notwithstanding any of the "definitions" or preliminary instructions contained within Plaintiff's Interrogatories, Defendant will provide responses which are required pursuant to the Federal Rules of Civil Procedure.

(E) As to any of the "definitions" which precede Plaintiff's Interrogatories and which seek information or documents which include trial preparation and/or privileged materials or communications, Defendant objects.

(F) The information supplied in these answers is not based solely upon the knowledge of the executing party, but includes knowledge of the party, its agents, its representative and attorneys, unless privileged.

(G) The word usage and sentencing structure may be that of the attorney assisting in the preparation of the answers and, thus, do not necessarily purport to be the precise language of the existing parties.

(H) The objections asserted by Defendant below are asserted in good faith, based upon counsel's evaluation of Defendant's discovery obligations under the Federal Rules of Civil Procedure. Nevertheless, Defendant, through counsel, offers and stands ready to confer with the Plaintiff in an effort to resolve or narrow, to the greatest extent possible, any dispute between the parties concerning Defendant objections.

(I) This preliminary statement is incorporated in each of the responses set forth below.

GENERAL OBJECTIONS

Defendant M.R.S. Associates, Inc. **OBJECTS** to Plaintiff's First Request for Admissions, First Set of Interrogatories, and First Request for Production of Documents to the extent that they request or seek the disclosure of information that is subject to the attorney-client privilege and/or the work-product doctrine, or any other applicable privilege or immunity. Defendant M.R.S. Associates, Inc. further **OBJECTS** to Plaintiff's First Request for Admissions, First Set of Interrogatories, and First Request for Production of Documents to the extent that they request or seek the disclosure of information that is Defendant's confidential and proprietary business information. Defendant further objects to these interrogatories to the extent that they seek the disclosure of information which would unduly invade the privacy rights of persons not party to this litigation or to whom Defendant has a duty of confidentiality.

Defendant M.R.S. Associates, Inc.'s responses set forth below are made without waiving in any manner: (a) the right to object to the use of any response for any purpose, in this action or any other actions, on the grounds of privilege, relevance, materiality or any other appropriate grounds; (b) the right to object to any other request for discovery and/or production involving or relating to the subject matter of the responses herein; and (c) the right to revise, correct, supplement or clarify any of the responses provided below as may be warranted by the parties' ongoing investigation of this action.

Defendant M.R.S. Associates, Inc.'s responses to Plaintiff's First Request for Admissions, First Set of Interrogatories, and First Request for Production of Documents are made pursuant to the Federal Rules of Civil Procedure using the ordinary meanings of words contained within those requests. To the extent that the definitions or instructions given by Plaintiff are in conflict with or are inconsistent with the Federal Rules of Civil Procedure, or purport to impose obligations on Defendant M.R.S. Associates, Inc. greater or different from those imposed by the Federal Rules of Civil Procedure, Defendant M.R.S. Associates, Inc. objects to them.

Subject to the foregoing Objections, which are specifically incorporated by reference into each of the following responses, Defendant M.R.S. Associates, Inc. hereby responds to Plaintiff's First Request for Admissions, First Set of Interrogatories, and First Request for Production of Documents:

REQUESTS FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 1: At no time prior to or during the subject time frame, did the Plaintiff provide the telephone number (562)822-0300 to the Defendant.

RESPONSE TO REQUEST FOR ADMISSION NO. 1:

DENIED.

REQUEST FOR ADMISSION NO. 2: The telephone number (562)882-0300 was assigned to a wireless telephone carrier during the subject time frame.

RESPONSE TO REQUEST FOR ADMISSION NO. 2:

OBJECTION. This request for admission seeks knowledge beyond the scope and extent of Defendant's knowledge. To the extent a response is required, the request for admission is DENIED.

REQUEST FOR ADMISSION NO. 3: The Defendant did not have the prior express consent of the Plaintiff to place calls using an automatic telephone dialing system or prerecorded or artificial voice to the telephone number (562)882-0300 during the subject time frame.

RESPONSE TO REQUEST FOR ADMISSION NO. 3:

DENIED.

INTERROGATORIES

INTERROGATORY NO. 1: Identify the dates and the time of day, in Eastern Standard Time, that You made telephone calls to the telephone number (562)882-0300 during the subject time frame.

RESPONSE TO INTERROGATORY NO. 1:

Pursuant to Federal Rule of Civil Procedure 33(d), the answer to this interrogatory may be derived from a review of Defendant's business records as the same are maintained in the ordinary course of its business. The responsive records which are within the possession, custody or control of Defendant will be produced for inspection and copying at a mutually convenient place and time upon the entry of a Protective Order protecting Defendant's confidential proprietary information from public disclosure and consist of Defendant's collection notes and telephone audit records. A proposed Protective Order is attached hereto as bates stamped pages 1 to 3.

INTERROGATORY NO. 2: Identify the dates and the time of day, in Eastern Standard Time, that You made telephone calls to the telephone number (562)882-0300 using an automatic telephone dialing system or made with an artificial or prerecorded voice.

RESPONSE TO INTERROGATORY NO. 2:

Pursuant to Federal Rule of Civil Procedure 33(d), Defendant intends to produce business records in response to Interrogatory No. 2. Answering further, Defendant intends to furnish documentation responsive to this Interrogatory upon the entry of a Protective Order protecting Defendant's confidential proprietary information from public disclosure. A proposed Protective Order is attached hereto as Bates-stamped pages 1 to 3.

INTERROGATORY NO. 3: Identify in detail, for the issuance of a subpoena, all employees or agents of the Defendant who were in any way associated with any call placed to the telephone number (562)882-0300 during the subject time frame.

RESPONSE TO INTERROGATORY NO. 3:

Defendant objects to Plaintiff's Interrogatory No. 4 on the basis that it is overbroad, vague, not sufficiently specific, and unduly burdensome. Defendant further objects on the grounds that the Interrogatory seeks documentation that is irrelevant to the instant litigation and not reasonably calculated to lead to admissible evidence. Subject to, and without waiving the above and foregoing objection, the following persons are former employees of defendant and were associated with the calls placed to plaintiff:

Arlene Carter, 1701 Salem Rd, Apt E1, Burlington Township, NJ 08016
Cherrell Cook, 1770 Abbey Rd, Apt 1533, Cherry Hill, NJ 08003
Amanda Green, 701 W Red Bank Ave, Unit F22, Woodbury, NJ 08096
Asia Green, 1627 Abbey Road, Cherry Hill, NJ 08003
Chris Minetti, 1702 Grand Ave., Apt 2, Asbury Park, NJ 07712
Jennifer Tremolini, 1309 Commissioners Pike, Mullica Hill, NJ 08062
Penny Watts, 1501 Little Goucest, Apt H20, Blackwood, NJ 08012
Catherine Westberry, 505 Clems Run Rd, Apt B, Mullica Hill, NJ 08062
Dustin White, 4688 Knightsbridge Blvd., Columbus, OH 43214

The following persons are current employees of Defendant MRS BPO, LLC and may be contacted through counsel for Defendant MRS BPO, LLC:

Roy Clevenger
Marc Croissette
Darnell Maxie
Joy Wehner

INTERROGATORY NO. 4: Identify in detail for the issuance of a subpoena, all telephone service providers used by You to place calls to the telephone number (562)882-0300 during the subject time frame.

RESPONSE TO INTERROGATORY NO. 4:

TimeWarner, 75 Rockefeller Plaza, New York, NY 10019, 212-484-8000
NobelBiz, 5973 Avenida Encinas, Suite 202, Carlsbad, CA 92008, 760-405-0105
Verizon, 1095 Avenue of the Americas, New York, NY 10036, 800-621-9900
Zone Telecom, 3 Executive Campus, Suite 520, Cherry Hill, NJ 08002, 866-333-9663
Qwest, 930 15th Street, Denver, CO 80202, 800-899-7780

INTERROGATORY NO. 5: Identify the telephone number or numbers that were used by You to make telephone calls to the telephone number (562)882-0300 during the subject time frame.

RESPONSE TO INTERROGATORY NO. 5:

Defendant does not know or have any records in its possession, custody, or control which would provide the answer to this Interrogatory.

INTERROGATORY NO. 6: Identify, in detail, how You obtained the Plaintiff's telephone number (562) 882-0300.

RESPONSE TO INTERROGATORY NO. 6:

Defendant was provided with the account records provided by it's client, Chase Bank USA, N.A.

INTERROGATORY NO. 7: Identify, in detail, how Your client obtained the Plaintiff's telephone number (562) 882-0300.

RESPONSE TO INTERROGATORY NO. 7:

OBJECTION. This interrogatory seeks knowledge beyond the scope and extent of Defendant's knowledge. Defendant further objects to this interrogatory in that the requested information is not relevant to the above-captioned action and is not calculated to lead to the discovery of admissible evidence.

REQUEST FOR PRODUCTION OF DOCUMENTS

REQUEST NO. 1: Provide a copy of any and all report(s) Defendant and/or Defendant's attorney obtained from any source concerning the Plaintiff.

RESPONSE TO REQUEST NO. 1:

OBJECTION. The request as drafted is overbroad, and any documents obtained by Defendant's attorney are subject to the attorney work product doctrine. Answering further, the Defendant reviewed Plaintiff's Collection Advantage report on December 4, 2009. Said report is part of the Defendant's business records regarding this account and said records will be produced for inspection and copying at a mutually convenient place and time.

REQUEST NO. 2: Provide a copy of the original application for the account(s) that the Defendant was attempting to collect from the Plaintiff.

RESPONSE TO REQUEST NO. 2:

All documents which are responsive to this request and within the possession, custody or control of the Defendant will be produced for inspection and copying at a mutually convenient place and time.

REQUEST NO. 3: All documents that you identified, referred to, or used in your response to the foregoing interrogatories.

RESPONSE TO REQUEST NO. 3:

All documents which are responsive to this request and within the possession, custody or control of Defendant will be produced for inspection and copying at a mutually convenient place and time.

REQUEST NO. 4: All reports, memoranda, or other documents generated by any expert witness, relating to any matter at issue in this case. Production should be made without regard to whether such expert is paid or unpaid, or testifying or not testifying.

RESPONSE TO REQUEST NO. 4:

There are no records responsive to this request.

REQUEST NO. 5: All documents which support your Answer in this action.

RESPONSE TO REQUEST NO. 5:

OBJECTION. Defendant objects to the request to the extent that it requires the production of information which is confidential and proprietary. Without waiving its objection. Defendant intends to furnish documentation responsive to this Interrogatory upon the entry of a Protective Order protecting Defendant's confidential proprietary information from public disclosure. A proposed Protective Order is attached hereto as Bates-stamped pages 1 to 3.

REQUEST NO. 6: Any and all documentation of telephone calls made by the Defendant to the telephone number (562) 882-0300.

RESPONSE TO REQUEST NO. 6:

Defendant objects to the request to the extent that it requires the production of information which is confidential and proprietary. Without waiving its objection. Defendant intends to furnish documentation responsive to this Interrogatory upon the entry of a Protective Order protecting Defendant's confidential proprietary information from public disclosure. A proposed Protective Order is attached hereto as Bates-stamped pages 1 to 3.

REQUEST NO. 7: Any and all correspondence, voice recordings, notes, memoranda, or any other documentation of communications between Plaintiff and/or his agents and the Defendant and/or its agents.

RESPONSE TO REQUEST NO. 7:

Defendant objects to the request to the extent that it requires the production of information which is confidential and proprietary. Without waiving its objection. Defendant intends to furnish documentation responsive to this Interrogatory upon the entry of a Protective Order protecting Defendant's confidential proprietary information from public disclosure. A proposed Protective Order is attached hereto as Bates-stamped pages 1 to 3.

REQUEST NO. 8: With reference and respect to Defendant's Fourth Defense wherein you allege "bona fide error,…notwithstanding the maintenance of procedures reasonably adapted to avoid such error," please provide any and all documentation regarding these procedures including but not limited to:

a. A listing of every FDCPA compliance course offered by the Defendant over the preceding three years

b. Attendance list of all the above compliance courses

c. Copies of all handouts, textbooks, transcripts and other course materials for the above courses

d. Instructor's name, current address and Curriculum Vitae for all of the above courses

e. Copies of all internal policies, procedures, memoranda and training materials regarding FDCPA compliance

f. Copies of each and every employee's acknowledgment of having obtained recurring FDCPA compliance training.

RESPONSE TO REQUEST NO. 8:

OBJECTION. The request as drafted is overbroad and not calculated to lead to the discovery of admissible evidence. Answering further, upon receipt of a more narrowly tailored request, Defendant will respond. Objecting further, Defendant's policies and procedures for debt collection are proprietary and confidential. The same will be produced upon entry of a Protective Order protecting Defendant's confidential proprietary information from public disclosure.

REQUEST NO. 9: Provide a copy of all agreements for the collection of debts between you and the alleged creditor(s) of the account(s) that you were attempting to collect from the Plaintiff.

RESPONSE TO REQUEST NO. 9:

OBJECTION. The request as drafted is overbroad and not calculated to lead to the discovery of admissible evidence.

This the 2nd day of March, 2011.

/s/ Caren D. Enloe
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